

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION II 245 PEACHTREE CENTER AVENUE NE, SUITE 1200 ATLANTA, GEORGIA 30303-1257

April 7, 2011

Mr. Tom E. Tynan Vice President - Vogtle Southern Nuclear Operating Company, Inc. Vogtle Electric Generating Plant 7821 River Road Waynesboro, GA 30830

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT – NRC PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000424/2011008 AND 05000425/2011008

Dear Mr. Tynan:

On February 25, 2011, the U. S. Nuclear Regulatory Commission (NRC) completed an inspection at your Vogtle Electric Generating Plant Units 1 and 2. The enclosed report documents the inspection findings, which were discussed on February 25, 2011, with you and other members of your staff.

The inspection was an examination of activities conducted under your license as they relate to the identification and resolution of problems, and compliance with the Commission's rules and regulations and with the conditions of your operating license. Within these areas, the inspection involved examination of selected procedures and representative records, observations of plant equipment and activities, and interviews with personnel.

On the basis of the samples selected for review, there were no findings identified during this inspection. The inspectors concluded that problems were properly identified, evaluated, and resolved within the corrective action program (CAP). However, during the inspection, some minor performance deficiencies were identified related to your prioritization and evaluation of identified problems and your adherence to site procedures associated with the self-assessment program.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document

system (ADAMS). Adams is accessible from the NRC Web site at <u>http://www.nrc.gov/reading-rm/adams.html</u> (the Public Electronic Reading Room).

Sincerely,

/RA/

George T. Hopper, Chief Reactor Projects Branch 7 Division of Reactor Projects

Docket No. 50-424, 50-425 License No. NPF-68, NPF-81

Enclosure: Inspection Report 05000424/2011008 and 05000425/2011008 w/Attachment: Supplemental Information

cc w/encl. (see page 2)

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cc w/encl. (continued next page)

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Letter to Tom E. Tynan from George T. Hopper dated April 7, 2011

SUBJECT: VOGTLE ELECTRIC GENERATING PLANT – NRC PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION REPORT 05000424/2011008 AND 05000425/2011008

Distribution w/encl: C. Evans, RII EICS L. Douglas, RII EICS OE Mail RIDSNRRDIRS PUBLIC RidsNrrPMVogtle Resource

U.S. NUCLEAR REGULATORY COMMISSION

REGION II

| Docket No.: | 50-424, 50-425 |
|--------------|---|
| License No.: | NPF-68, NPF-81 |
| Report No.: | 05000424/2011008 and 05000425/2011008 |
| Licensee: | Southern Nuclear Operating Company, Inc |
| Facility: | Vogtle Electric Generating Plant, Units 1 and 2 |
| Location: | Waynesboro, GA |
| Dates: | February 7 - 11, 2011 February 22 - 25, 2011 |
| Inspectors: | B. Collins, Reactor Inspector D. Hardage, Resident Inspector, Hatch M. King, Sr. Project Engineer, Team Leader J. Quinones-Navarro, Project Engineer E. Stamm, Project Engineer |
| Approved by: | G. Hopper, Chief, Reactor Projects Branch 7 Division of Reactor Projects |

SUMMARY OF FINDINGS

IR 05000424/2011008, 05000425/2011008; February 7 – 25, 2011; Vogtle Electric Generating Plant, Units 1 and 2; Biennial Inspection of the Problem Identification and Resolution Program.

The inspection was conducted by a senior project engineer, two project engineers, a reactor engineer, and a resident inspector. No findings were identified. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process."

Identification and Resolution of Problems

The inspectors concluded that, in general, problems were properly identified, evaluated, prioritized, and corrected. The licensee was effective at identifying problems and entering them into the corrective action program (CAP) for resolution, as evidenced by the relatively few number of deficiencies identified by external organizations (including the NRC) that had not been previously identified by the licensee, during the review period. Generally, prioritization and evaluation of issues were adequate, formal root cause evaluations for significant problems were adequate, and corrective actions specified for problems were acceptable. Overall, corrective actions developed and implemented for issues were generally effective and implemented in a timely manner. However, the inspectors did identify minor performance deficiencies in the area of prioritization and evaluation of identified problems.

The inspectors determined that overall; audits and self-assessments were adequate in identifying deficiencies and areas for improvement in the CAP, and appropriate corrective actions were developed to address the issues identified. However, the inspectors identified minor performance deficiencies associated with the self-assessment program. Operating experience usage was found to be generally acceptable and integrated into the licensee's processes for performing and managing work, and plant operations.

Based on discussions and interviews conducted with plant employees from various departments, the inspectors determined that personnel at the site felt free to raise safety concerns to management and use the CAP to resolve those concerns.

4. OTHER ACTIVITIES

4OA2 Problem Identification and Resolution

a. Assessment of the Corrective Action Program

(1) Inspection Scope

The inspectors reviewed the licensee's CAP procedures which described the administrative process for initiating and resolving problems primarily through the use of condition reports (CRs). To verify that problems were being properly identified. appropriately characterized, and entered into the CAP, the inspectors reviewed CRs that had been issued between December 2008 and February 2011, including a detailed review of selected CRs associated with the following risk-significant systems: Nuclear Service Cooling Water (NSCW), Component Cooling Water (CCW), Auxiliary Feedwater (AFW), and Emergency Diesel Generators (EDGs). Where possible, the inspectors independently verified that the corrective actions were implemented as intended. The inspectors also reviewed selected common causes and generic concerns associated with root cause evaluations to determine if they had been appropriately addressed. To help ensure that samples were reviewed across all cornerstones of safety identified in the NRC's Reactor Oversight Process (ROP), the inspectors selected a representative number of CRs that were identified and assigned to the major plant departments, including operations, maintenance, engineering, health physics, chemistry, and security. These CRs were reviewed to assess each department's threshold for identifying and documenting plant problems, thoroughness of evaluations, and adequacy of corrective actions. The inspectors reviewed selected CRs, verified corrective actions were implemented, and attended meetings where CRs were screened for significance to determine whether the licensee was identifying, accurately characterizing, and entering problems into the CAP at an appropriate threshold.

The inspectors conducted plant walkdowns of equipment associated with the selected systems and other plant areas to assess the material condition and to look for any deficiencies that had not been previously entered into the CAP. The inspectors reviewed CRs, maintenance history, completed work orders (WOs) for the systems, and reviewed associated system health reports. These reviews were performed to verify that problems were being properly identified, appropriately characterized, and entered into the CAP. Items reviewed generally covered a two-year period of time; however, in accordance with the inspection procedure, a five-year review was performed for selected systems for age-dependent issues.

Control Room walkdowns were also performed to assess the main control room (MCR) deficiency list and to ascertain if deficiencies were entered into the CAP. Operator Workarounds and Operator Burden screenings were reviewed, and the inspectors verified compensatory measures for deficient equipment which were being implemented in the field.

The inspectors conducted a detailed review of selected CRs to assess the adequacy of the root-cause and apparent-cause evaluations of the problems identified. The inspectors reviewed these evaluations against the descriptions of the problem described in the CRs and the guidance in licensee procedure NMP-GM-002-006, "Root Cause

Analysis Instruction" and NMP-GM-002-007, "Apparent Cause Determination Instruction." The inspectors assessed if the licensee had adequately determined the cause(s) of identified problems, and had adequately addressed operability, reportability, common cause, generic concerns, extent-of-condition, and extent-of-cause. The review also assessed if the licensee had appropriately identified and prioritized corrective actions to prevent recurrence.

The inspectors reviewed selected industry operating experience items, including NRC generic communications to verify that they had been appropriately evaluated for applicability and that issues identified through these reviews had been entered into the CAP.

The inspectors reviewed site trend reports to determine if the licensee effectively trended identified issues and initiated appropriate corrective actions when adverse trends were identified.

The inspectors attended various plant meetings to observe management oversight functions of the corrective action process. These included CR screening meetings and Management Review Committee (MRC) meetings.

Documents reviewed are listed in the Attachment.

(2) Assessment

Identification of Issues

The inspectors determined that the licensee was generally effective in identifying problems and entering them into the CAP and there was a low threshold for entering issues into the CAP. This conclusion was based on a review of the requirements for initiating CRs as described in licensee procedure NMP-GM-002, "Corrective Action Program," management's expectation that employees were encouraged to initiate CRs for any reason, and the relatively few number of deficiencies identified by inspectors during plant walkdowns not already entered into the CAP. Trending was generally effective in monitoring equipment performance. Site management was actively involved in the CAP and focused appropriate attention on significant plant issues.

Based on reviews and walkdowns of accessible portions of the selected systems, the inspectors determined that system deficiencies were being identified and placed in the CAP.

Prioritization and Evaluation of Issues

Based on the review of CRs sampled by the inspection team during the onsite period, the inspectors concluded that problems were generally prioritized and evaluated in accordance with the licensee's CAP procedures as described in the CR severity level determination guidance in NMP-GM-002-001, "Corrective Action Program Instructions."

Each CR was assigned a severity level at the CAP coordinator (CAPCO) meeting, and adequate consideration was given to system or component operability and associated plant risk.

The inspectors determined that station personnel had conducted root cause and apparent cause analyses in compliance with the licensee's CAP procedures and assigned cause determinations were appropriate, considering the significance of the issues being evaluated. A variety of formal causal-analysis techniques were used depending on the type and complexity of the issue consistent with NMP-GM-002-006 and NMP-GM-002-007.

The inspectors identified three performance deficiencies associated with the licensee's prioritization and evaluation of issues. These issues were screened in accordance with Manual Chapter 0612, "Issue Screening," and were determined to be of minor significance and not subject to enforcement action in accordance with the NRC's Enforcement Policy.

- The inspectors identified two instances (CR 2010109831 and CR 2010101078) where enhanced apparent cause determinations (ACDs) and associated effectiveness reviews were not conducted for NRC non-cited violations (NCVs) as required by NMP-GM-002-001, Attachment 1, Version 15, dated December 17, 2009. The licensee initiated CR 2011101911 to address this issue.
- The inspectors identified one example (CR 2009108930) where a broadness review was not conducted on an equipment related issue as required by NMP-GM-002-007. The licensee initiated CR 2011101909 to address this issue.
- The inspectors identified that an apparent cause determination associated with NSCW discharge motor operated valves (MOVs) (CR 2009108594) did not identify a potential conduct of maintenance/procedural quality issue which appeared to contribute to the repeat occurrences of water being found in the MOV actuators. The licensee initiated CR 2011101964 to address this issue.

Effectiveness of Corrective Actions

Based on a review of corrective action documents, interviews with licensee staff, and verification of completed corrective actions, the inspectors determined that overall, corrective actions were timely, commensurate with the safety significance of the issues, and effective, in that conditions adverse to quality were corrected and non-recurring. For significant conditions adverse to quality, the corrective actions directly addressed the cause and effectively prevented recurrence in that a review of performance indicators, CRs, and effectiveness reviews demonstrated that the significant conditions adverse to quality had not recurred. Effectiveness reviews for corrective actions to prevent recurrence (CAPRs) were sufficient to ensure corrective actions were properly implemented and were effective.

The inspectors identified one performance deficiency associated with Action Item (AI) 2004200408. The AI was associated with safety related motor starters and was extended one year to December 31, 2011 with management approval. Inspectors identified that an assessment of the impact to plant was not documented as required by

NMP-GM-002-001. This issue was screened in accordance with Manual Chapter 0612 and was determined to be of minor significance and not subject to enforcement action in accordance with the NRC's Enforcement Policy. The licensee entered this issue into their corrective action program as CR 2011102487.

(3) <u>Findings</u>

No findings were identified.

b. Assessment of the Use of Operating Experience (OE)

(1) Inspection Scope

The inspectors examined licensee programs for reviewing industry operating experience, reviewed licensee procedure NMP-GM-008, "Operating Experience Program," reviewed the licensee's operating experience database to assess the effectiveness of how external and internal operating experience data was handled at the plant. In addition, the inspectors selected operating experience documents (e.g., NRC generic communications, 10 CFR Part 21 reports, licensee event reports, vendor notifications, and plant internal operating experience items, etc.), which had been issued since December 2008 to verify whether the licensee had appropriately evaluated each notification for applicability to the Vogtle plant, and whether issues identified through these reviews were entered into the CAP. Procedure NMP-GM-008, "Operating Experience Program," was reviewed to verify that the requirements delineated in the program were being implemented at the station. Documents reviewed are listed in the Attachment.

(2) Assessment

Based on a review of documentation related to the review of operating experience issues, the inspectors determined that the licensee was generally effective in screening operating experience for applicability to the plant. Industry OE was evaluated by plant OE Coordinators and relevant information was then forwarded to the applicable department for further action or informational purposes. OE issues requiring action were entered into the CAP for tracking and closure. In addition, operating experience was included in all root cause evaluations in accordance with licensee procedure NMP-GM-002-006.

(3) <u>Findings</u>

No findings were identified.

- c. Assessment of Self-Assessments and Audits
- (1) Inspection Scope

The inspectors reviewed audit reports and self-assessment reports, including those which focused on problem identification and resolution, to assess the thoroughness and self-criticism of the licensee's audits and self assessments, and to verify that problems

identified through those activities were appropriately prioritized and entered into the CAP for resolution in accordance with licensee procedure NMP-GM-003, "Self Assessment"

(2) Assessment

The inspectors determined that the scopes of assessments and audits were adequate. Self-assessments were generally detailed and critical, as evidenced by findings consistent with the inspector's independent review. The inspectors verified that CRs were created to document all areas for improvement and findings resulting from the selfassessments, and verified that actions had been completed consistent with those recommendations. Generally, the licensee performed evaluations that were technically accurate. Site trend reports were thorough and a low threshold was established for evaluation of potential trends, as evidenced by the CRs reviewed that were initiated as a result of adverse trends.

The inspectors identified two performance deficiencies associated with the licensee's self-assessment program. These issues were screened in accordance with Manual Chapter 0612 and were determined to be of minor significance and not subject to enforcement action in accordance with the NRC's Enforcement Policy.

- CR 2010114322 was initiated November 2010 after the Nuclear Safety Review Board (NSRB) identified that a large number of self-assessments were not conducted in 2010 as planned. Inspectors noted that the resulting CR action item was to prepare a response for the next NSRB meeting. The prepared response identified several corrective actions to address the issue; however, no additional CRs or CR action items were initiated as required by NMP-GM-002. The inspectors noted that less than one third of the self-assessments scheduled to be conducted in 2009 and 2010 were actually conducted (9 of 31 conducted in 2009 and 11 of 34 conducted in 2010). Of the 11 self-assessments conducted in 2010, inspectors identified that two were led by personnel who did not have active self-assessment team leader qualifications as required by NMP-GM-003. The licensee initiated CR 2011101729 to address this issue.
- (3) Findings

No findings were identified.

d. Assessment of Safety-Conscious Work Environment

(1) Inspection Scope

The inspectors randomly interviewed 20 on-site workers regarding their knowledge of the corrective action program at Vogtle and their willingness to write CRs or raise safety concerns. During technical discussions with members of the plant staff, the inspectors conducted interviews to develop a general perspective of the safety-conscious work environment at the site. The interviews were also conducted to determine if any conditions existed that would cause employees to be reluctant to raise safety concerns. The inspectors reviewed the licensee's Employee Concerns Program (ECP) and interviewed the ECP manager. Additionally, the inspectors reviewed a sample of ECP

issues to verify that concerns were being properly reviewed and identified deficiencies were being resolved and entered into the CAP when appropriate.

(2) Assessment

Based on the interviews conducted and the CRs reviewed, the inspectors determined that licensee management emphasized the need for all employees to identify and report problems using the appropriate methods established within the administrative programs, including the CAP and ECP. These methods were readily accessible to all employees. Based on discussions conducted with a sample of plant employees from various departments, the inspectors determined that employees felt free to raise issues, and that management encouraged employees to place issues into the CAP for resolution. The inspectors did not identify any reluctance on the part of the licensee staff to report safety concerns.

(3) <u>Findings</u>

No findings were identified.

4OA6 Meetings, Including Exit

On February 25, 2011, the inspectors presented the inspection results to Mr. Tom Tynan and other members of the site staff. The inspectors confirmed that all proprietary information examined during the inspection had been returned to the licensee.

ATTACHMENT: SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee personnel:

- M. Carstensen, CAP Supervisor
- N. Crawford, Performance Improvement Sr. Engineer
- M. Hickox, Principal Licensing Engineer
- D. Hill, Nuclear Technical Specialist
- D. Manigo, CCW System Engineer
- J. March, Concerns Program Manager
- D. Puckett, Performance Improvement Supervisor
- L. Sanchez, NSCW System Engineer, AFW System Engineer
- M. Sharma, Nuclear Specialist
- M. Slivka, Engineering Programs Manager, Vogtle 3 & 4
- K. Stokes, EDG System Engineer

NRC personnel:

- M. Cain, Senior Resident Inspector
- T. Chandler, Resident Inspector
- G. Hopper, Chief, Branch 7, Division of Reactor Projects

LIST OF REPORT ITEMS

Opened and Closed

None

Closed

None

Discussed

None

LIST OF DOCUMENTS REVIEWED

Procedures

00356-C, Maintenance Rule Expert Panel - Duties and Responsibilities, Version 4.4 50028-C, Engineering Maintenance Rule Implementation, Version 18.0 NMP-AD-012, Operability Determinations and Functionality Assessments, Version 6 NMP-AD-012-GL01, Prompt Determination of Operability Guideline, Version 3.0 NMP-AD-012-GL02, Functionality Assessment Guideline, Version 3.0 NMP-AD-022, Regulatory Oversight Process (ROP) Regulatory Process, Version 1.0 NMP-AD-028, 10 CFR 21 Evaluation and Reporting Requirements, Version 1.0 NMP-ES-002, System Monitoring and Health Reporting, Version 14.0 NMP-ES-002, System Monitoring and Health Reporting, Version 14, dated December 30, 2010 NMP-GM-002, Corrective Action Program, Version 11, dated January 6, 2011 NMP-GM-002, Corrective Action Program, Versions 8.0 - 11.0 NMP-GM-002-001. Corrective Action Program Instructions. Versions 20.0 - 21.0 NMP-GM-002-002, Effectiveness Review Instruction, Version 1.0 NMP-GM-002-006, Root Cause Analysis Instruction, Version 1.0 NMP-GM-002-007, Apparent Cause Determination Instruction, Version 1.0 NMP-GM-002-008, Common Cause Instruction, Version 1.0 NMP-GM-002-GL03, Cause Analysis and Coding Guideline, Version 14.0 NMP-GM-003, Self Assessment Procedure, Version 16.0 NMP-GM-003-001, Self-Assessment Instructions, Version 1.0 NMP-GM-006, Work Management

NMP-GM-008, Operating Experience, Version 11

Southern Nuclear Company Concerns Program Procedure, Version 11

Condition reports (CRs)

| 2006100187 | 2009100568 | 2009105100 | 2009110774 |
|------------|------------|------------|------------|
| 2006102295 | 2009100597 | 2009105711 | 2009110849 |
| 2006105420 | 2009100617 | 2009105723 | 2009110940 |
| 2006107603 | 2009100641 | 2009107537 | 2009111340 |
| 2006110981 | 2009100878 | 2009107894 | 2009111569 |
| 2007105979 | 2009101177 | 2009108014 | 2009111757 |
| 2007109614 | 2009101444 | 2009108541 | 2009111789 |
| 2007110797 | 2009101666 | 2009108577 | 2009111790 |
| 2007111236 | 2009102006 | 2009108594 | 2009111791 |
| 2007112805 | 2009102248 | 2009108670 | 2009111793 |
| 2008100836 | 2009102357 | 2009108691 | 2009111978 |
| 2008107081 | 2009102545 | 2009108930 | 2009112145 |
| 2008107416 | 2009102723 | 2009109313 | 2009112234 |
| 2009100077 | 2009102838 | 2009109416 | 2009112319 |
| 2009100144 | 2009102856 | 2009109857 | 2009112703 |
| 2009100405 | 2009102968 | 2009109862 | 2010100044 |
| 2009100475 | 2009103362 | 2009110632 | 2010100103 |
| 2009100490 | 2009104090 | 2009110637 | 2010100128 |
| 2009100497 | 2009104975 | 2009110639 | 2010100386 |
| 2009100532 | 2009104979 | 2009110742 | 2010100623 |
| 2009100558 | 2009105042 | 2009110773 | 2010100811 |
| | | | Attachment |

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| 2010100861 | 2010102771 | 2010107040 | 2010113420 |
|--------------|------------|------------|------------|
| 2010100869 | 2010102893 | 2010107677 | 2010113641 |
| 2010101071 | 2010102935 | 2010109094 | 2010113782 |
| 2010101074 | 2010103107 | 2010109537 | 2010113798 |
| 2010101077 | 2010103274 | 2010109538 | 2010113800 |
| 2010101078 | 2010103466 | 2010109581 | 2010114068 |
| 2010101129 | 2010103574 | 2010109614 | 2010114322 |
| 2010101334 | 2010103598 | 2010109830 | 2010114323 |
| 2010101558 | 2010103680 | 2010109831 | 2010114324 |
| 2010101559 | 2010103730 | 2010109883 | 2010206391 |
| 2010101625 | 2010103739 | 2010110011 | 2011100088 |
| 2010101780 | 2010103815 | 2010110738 | 2011100873 |
| 2010101925 | 2010103894 | 2010110784 | 2011100973 |
| 2010102012 | 2010104035 | 2010110840 | 2011101145 |
| 2010102068 | 2010104441 | 2010110945 | 2011101317 |
| 2010102206 | 2010105091 | 2010110985 | 2011101492 |
| 2010102371 | 2010105289 | 2010111046 | 2011101494 |
| 2010102383 | 2010105325 | 2010111368 | 2011101766 |
| 2010102456 | 2010105329 | 2010111533 | 2011101768 |
| 2010102482 | 2010105594 | 2010111779 | 2011101808 |
| 2010102537 | 2010105732 | 2010112071 | 2011102485 |
| 2010102593 | 2010106248 | 2010112710 | 2011102488 |
| 2010102612 | 2010107028 | 2010112777 | 2011102521 |
| 2010102639 | 2010107030 | 2010113258 | |
| Action Items | | | |
| 2004200408 | 2009204865 | 2010200183 | 2010201329 |
| 2009202209 | 2009204866 | 2010200654 | 2010201570 |
| 2009202210 | 2009206147 | 2010200656 | 2010204092 |
| 2009202212 | 2009206148 | 2010201111 | |
| 2009202663 | 2009206149 | 2010201119 | |
| 2009204864 | 2010200182 | 2010201121 | |

Work Orders

MWO 1091606601 MWO 1091606701

Self-Assessments

2009 Vendor Oversight Self Assessment, November 24, 2009
Apparent Cause/Basic Cause Determination Self-Assessment, August 24-September 2, 2009
Chemistry QA/QC Program Site Focused Self-Assessment, September 1-3, 2009
Fleet Emergency Preparedness NRC Rulemaking Team Self Assessment, September 8, 2009
Health Physics Department Process Performance Efficiency Focused Self Assessment, August 17-28, 2009
Operations Crew Performance Focused Self Assessment November 10-11, 2009
Plant Vogtle B.5.b Focused Self-Assessment, May 12-15, 2008
Plant Vogtle Security Self-Assessment
Predictive Maintenance Self Assessment, July 28-August 1, 2008

Attachment

Southern Nuclear Company Fleet Security Vigilance Self-Assessment, October 27-29, 2009 V- HP-2009, Fleet Oversight Audit of Health Physics, August 11, 2009 V-FOA-CHEM-2009-1, Fleet Oversight Assessment Chemistry Laboratory QA/QC 17-28, 2009

Other Documents

Emergency Diesel Generator System Health Report 3rd Quarter 2010 Emergency Diesel Generator System Design Bases, dated September 24, 2010 Plant Vogtle System Health Report – Component Cooling Water System (1203) RER C100567701 RER C100567702